

Central Vermont Public Service Corporation

Power Planning & Regulatory Affairs

July 14, 2006

Ms. Susan M. Hudson, Clerk Vermont Public Service Board Chittenden Bank Building, 4th Floor 112 State Street; Post Office Drawer 20 Montpelier, Vermont 05620-2701

Re: EEU Budget Adjustment; Energy Efficient Charge Adjustment

Dear Ms. Hudson:

By Memorandum dated June 29, 2006, the Public Service Board (the "Board") asked Vermont electric distribution utilities to file comments addressing whether they would be able to modify their billing systems in time for new Energy Efficiency Charge ("EEC") rates to take effect on a bills rendered basis effective September 1, 2006 if the Board were to issue notice of the final revised EECs on August 15, 2006. By this letter Central Vermont Public Service Corporation ("CVPS" or the "Company") advises the Board that it would be able to meet the proposed schedule to the extent that the design of the EEC rates remains as is. That is, if the EEC rates merely change in level, the Company could implement the change relatively quickly. However, if there is a rate design change, the Company would need much more time to program these changes and do adequate testing to ensure accurate bills for our customers.

As the Board is aware, the proposed schedule is very tight and leaves little room for utility billing system testing. It also provides only a limited opportunity to prepare a bill stuffer to advise customers of the EEC rate change. Accordingly, to the extent that the Board could provide notice of the new EEC rates sooner, it would help the Company to meet the schedule.

Central Vermont very much appreciates the opportunity to offer comments in this matter. Should you have questions or wish to discuss any matter raised in this submission, please feel free to contact me.

Respectfully submitted,

Bruce W. Bentley

c: Electronic Service List